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February 1, 2007

Via Electronic ECFS Filing

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Washington, DC 20554

RE: Certification of CPNI Filing (February 6, 2007), EB-06-TC-060

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules¹ and the Commission's *Public Notice*, DA 06-233, dated January 30, 2006, WorldNet Telecommunications, Inc. ("WorldNet"), through its undersigned counsel, hereby submits its compliance certificate regarding the Company's compliance with the customer proprietary network information ("CPNI") regulations. The Company's CPNI policies and operating procedures are outlined in the Statement of CPNI Usage Procedures, which is also attached.

Questions regarding this matter may be directed to me.

Sincerely,



James N. Moskowitz
Counsel for
WorldNet Telecommunications, Inc.

192763

¹ 47 C.F.R. §64.2009(e).

WORLDNET TELECOMMUNICATIONS, INC

**CERTIFICATE OF
CPNI USAGE COMPLIANCE**

As a corporate officer of WorldNet Telecommunications, Inc., I hereby certify that, based on my best information and belief, WorldNet has, and is complying with, operating procedures that ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI") as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement of CPNI Usage Compliance documents WorldNet's CPNI operating procedures.



Lawrence R. Freedman, President

Dated: 2/1/07

Attachment
Statement of CPNI Usage Operating Procedures.

WORLDNET TELECOMMUNICATIONS, INC.

STATEMENT OF CPNI USAGE OPERATING PROCEDURES

The CPNI policies and operating procedures of WorldNet Telecommunications, Inc., are designed to ensure compliance with the FCC's CPNI rules. Such policies and procedures are as follows:

I. CPNI Use

- (A) WorldNet may use CPNI to protect its rights and property and to protect our customers and other carriers from fraudulent, abusive or unlawful use of our services.
- (B) WorldNet may use CPNI to provide or market service offerings among the categories of service -- local and interexchange -- to which the customer already subscribes. If a customer subscribes to only one service category, we will not share the customer's CPNI without the customer's consent.
- (C) WorldNet may use CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and forward, and protocol conversion, without customer approval.
- (D) WorldNet does not use CPNI to provide or market service offerings within a category of service to which the customer does not already subscribe without customer approval through an "opt-out mechanism", discussed below. However, WorldNet may use CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market services formerly known as adjunct-to-basic services when we provide local service. These services include, but are not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.
- (E) WorldNet does not use CPNI to identify or track customers that call competing service providers.

II. CPNI Approvals

- (A) WorldNet uses an "opt-out" CPNI customer approval mechanism.
- (B) WorldNet honors our customers' approval or disapproval until the customer revokes or limits such approval or disapproval. We maintain all records of customer approvals for at least one year.

III. CPNI Notice Requirements

- (A) WorldNet will individually notify and inform each customer of his or her right to restrict the use of its CPNI. This notice may be accompanied by a solicitation of approval. WorldNet shall maintain records of that notification for at least one year.
- (B) WorldNet uses an “opt-out” approval mechanism.
- (C) WorldNet’s notifications provide information sufficient to enable our customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. WorldNet’s notifications: (a) contain a statement that the customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we indicate that any approval, or disapproval, will remain in effect until the customer affirmatively revokes or limits such approval or denial.
- (D) WorldNet advises the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and we clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, we may provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we may state that the customer’s consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the customer’s needs.
- (E) Our notifications are comprehensible and not misleading and are legible, sufficiently in large type, and placed in an area readily apparent to the customer. Where the notification is in a language other than English, all portions of the notification are in that language.
- (F) We do not include in the notification any statement that attempts to encourage a customer to freeze third-party access to CPNI.

IV. CPNI Safeguards

- (A) WorldNet has implemented a system by which the status of a customer’s CPNI approval can be clearly established prior to the use of the CPNI.
- (B) WorldNet has trained our personnel as to when they are, and are not, authorized to use CPNI, and has put into place an express disciplinary process in place to deal with employee failures.

- (C) WorldNet has implemented a system for maintaining a record of our sales and marketing campaigns that use customers' CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. WorldNet retains these records for at least one year.
- (D) WorldNet has a supervisory-level employee who oversees all matters relating to CPNI compliance. In addition, a WorldNet officer signs a compliance certificate on an annual basis stating that the officer has personal knowledge that WorldNet has established operating procedures adequate to ensure compliance with applicable CPNI rules. WorldNet will provide a statement accompanying the Certificate that explains our operating procedures and demonstrates compliance with the CPNI rules.